

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLENDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF TECHNOLOGY, UNIVERSITY OF CHICAGO, THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES OF DARTMOUTH COLLEGE, DUKE UNIVERSITY, EMORY UNIVERSITY, GEORGETOWN UNIVERSITY, THE JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS INSTITUTE OF TECHNOLOGY, NORTHWESTERN UNIVERSITY, UNIVERSITY OF NOTRE DAME DU LAC, THE TRUSTEES OF THE UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH RICE UNIVERSITY, VANDERBILT UNIVERSITY, and YALE UNIVERSITY,

Defendants.

Case No. 1:22-cv-00125

Hon. Matthew F. Kennelly

PLAINTIFFS' MOTION TO COMPEL PRODUCTION IN RESPONSE TO PENDING REQUESTS FOR THE PRODUCTION OF DOCUMENTS

Plaintiffs respectfully move to compel Defendants to produce responsive documents in response to Plaintiffs' pending requests for the production of documents, on the grounds set forth in the supporting memorandum submitted on this same date and in the declarations and exhibits submitted therewith, and as reflected in the Proposed Order that Plaintiffs are submitting herewith.

Dated: March 21, 2023

By:/s/Robert D. Gilbert

Robert D. Gilbert

Elpidio Villarreal

Robert S. Raymar

Sarah Schuster

Alexis Marquez

Steven Magnusson

**GILBERT LITIGATORS &
COUNSELORS, P.C.**

11 Broadway, Suite 615

New York, NY 10004

Phone: (646) 448-5269

rgilbert@gilbertlitigators.com

pdvillarreal@gilbertlitigators.com

rraymar@gilbertlitigators.com

sschuster@gilbertlitigators.com

amarquez@gilbertlitigators.com

smagnusson@gilbertlitigators.com

/s/ Edward J. Normand Devin

“Vel” Freedman

Edward J. Normand

Peter Bach-y-Rita

**FREEDMAN NORMAND
FRIEDLAND LLP**

99 Park Avenue

Suite 1910

New York, NY 10016

Tel: 646-970-7513

vel@fnf.law

tnormand@fnf.law

pbachyrita@fnf.law

Eric L. Cramer

Caitlin G. Coslett

BERGER MONTAGUE PC

1818 Market Street, Suite 3600

Philadelphia, PA 19103

Tel: 215-875-3000

ecramer@bm.net

ccoslett@bm.net

Daniel J. Walker

Robert E. Litan

Hope Brinn

BERGER MONTAGUE PC

2001 Pennsylvania Avenue, NW

Suite 300

Washington, DC 20006

Tel: 202-559-9745

rlitan@bm.net

dwalker@bm.net

hbrinn@bm.net

Richard Schwartz

BERGER MONTAGUE PC

1720 W Division

Chicago, IL 60622

Tel: 773-257-0255

rschwartz@bm.net

Counsel for Plaintiffs